

EXHIBIT 23



Outlook

Re: Snookal, Mark v. Chevron USA, Inc. | Dr. Victor Adeyeye's Deposition

From Olivia Flechsig <oflechsig@amglaw.com>**Date** Tue 12/10/2024 4:46 PM**To** Sarah Fan <SFan@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>**Cc** Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Karis Stephen <kstephen@amglaw.com>

Dear Sarah,

Following up on my previous email. Please let me know ASAP whether we can go forward with December 17th.

Best,
Olivia

Get [Outlook for iOS](#)

From: Olivia Flechsig <oflechsig@amglaw.com>**Sent:** Thursday, December 5, 2024 12:36:47 PM**To:** Sarah Fan <SFan@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>**Cc:** Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Karis Stephen <kstephen@amglaw.com>**Subject:** Re: Snookal, Mark v. Chevron USA, Inc. | Dr. Victor Adeyeye's Deposition

Dear Sarah,

12/17 works for me, but unfortunately I could not do 12/18 or 12/20.

Best,
Olivia

Olivia Flechsig, Esq.
ALLRED, MAROKO & GOLDBERG
6300 Wilshire Boulevard, Suite 1500
Los Angeles, CA 90048
(323) 653-6530
(323) 653-1660, Facsimile

New York Office
305 Broadway, Suite 607
New York, NY 10007

From: Sarah Fan <SFan@sheppardmullin.com>

Sent: Thursday, December 5, 2024 12:27 PM

To: Olivia Flechsig <oflechtsig@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Karis Stephen <kstephen@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron USA, Inc. | Dr. Victor Adeyeye's Deposition

Hello Olivia:

I am working to confirm dates. Would you mind providing your availability the following week, in case we need more options? I am available on 12/17, 12/18, and 12/20.

Thanks,

-Sarah

Sarah Fan | Associate

SheppardMullin | Los Angeles

+1 213-617-5549 | ext. 15549

From: Olivia Flechsig <oflechtsig@amglaw.com>

Sent: Thursday, December 5, 2024 11:00 AM

To: Sarah Fan <SFan@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Karis Stephen <kstephen@amglaw.com>

Subject: Re: Snookal, Mark v. Chevron USA, Inc. | Dr. Victor Adeyeye's Deposition

Good Morning,

Since we haven't heard from you, I assume we're not going forward today or tomorrow, but please let us know ASAP if we can plan for Dr. Adeyeye's depo to go forward on December 11.

Best,

Olivia

Olivia Flechsig, Esq.

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New York, NY 10007

From: Olivia Flechsig <oflechtsig@amglaw.com>

Sent: Tuesday, December 3, 2024 1:28 PM

To: Sarah Fan <SFan@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Karis Stephen <kstephen@amglaw.com>

Subject: Re: Snookal, Mark v. Chevron USA, Inc. | Dr. Victor Adeyeye's Deposition

Dear Sarah,

Please let us know ASAP whether Dr. Adeyeye's deposition will be going forward on December 5, 6, or 11. We need to make sure we can get an appropriate court reporter for the job.

Best,
Olivia

Olivia Flechsig, Esq.
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From: Sarah Fan <SFan@sheppardmullin.com>

Sent: Friday, November 15, 2024 5:56 PM

To: Olivia Flechsig <oflechtsig@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Karis Stephen <kstephen@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron USA, Inc. | Dr. Victor Adeyeye's Deposition

Thank you – if you could hold these dates on your calendar pending confirmation from Dr. Adeyeye's office, that would be appreciated.

-Sarah

Sarah Fan | Associate
SheppardMullin | Los Angeles
+1 213-617-5549 | direct

EXHIBIT 23/3

From: Olivia Flechsig <oflechsig@amglaw.com>
Sent: Friday, November 15, 2024 10:18 AM
To: Sarah Fan <SFan@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>
Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Karis Stephen <kstephen@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron USA, Inc. | Dr. Victor Adeyeye's Deposition

Dear Sarah,

Thank you for this info. We can do December 5, 6, or 11 to finish his depo.

Best,
Olivia

From: Sarah Fan <SFan@sheppardmullin.com>
Sent: Friday, November 15, 2024 8:38 AM
To: Olivia Flechsig <oflechsig@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>
Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Karis Stephen <kstephen@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron USA, Inc. | Dr. Victor Adeyeye's Deposition

Hello Olivia:

Dr. Adeyeye is out of the office starting tomorrow. Can you please let me know at your earliest convenience your availability for a second session of Dr. Adeyeye's deposition between December 5 and 13?

Thank you,
-Sarah

Sarah Fan | Associate
SheppardMullin | Los Angeles
+1 213-617-5549 | direct

From: Olivia Flechsig <oflechsig@amglaw.com>
Sent: Thursday, November 14, 2024 11:04 AM
To: Sarah Fan <SFan@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>
Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Karis Stephen <kstephen@amglaw.com>
Subject: Re: Snookal, Mark v. Chevron USA, Inc. | Dr. Victor Adeyeye's Deposition

Hi Sarah,

Sorry for the confusion — it is Lexitas and I was mistaken. They should have just resent the information moments ago, with the correct start time. I copied same below for the sake of convenience.

Best,
Olivia

Topic: Dr. Victor Adeyeye (REMOTE DEPOSITION) | Mark Snookal v. Chevron USA, Inc. | JOB#117195

EXHIBIT 23/4

Join Zoom Meeting:

<https://zoom.us/j/94076052770?pwd=d552awjL1Ny0EoTMlrdbmtaViFiMHa.1>

Meeting ID:

94076052770

Passcode:

858182

Dial By Phone:

+1 646 931 3860

From: Sarah Fan <SFan@sheppardmullin.com>

Sent: Thursday, November 14, 2024 10:57 AM

To: Olivia Flechsig <oflechsig@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron USA, Inc. | Dr. Victor Adeyeye's Deposition

Thank you for confirming. I received the attached from Lexitas Legal, but nothing from Imagine Reporting.

Sarah Fan | Associate

SheppardMullin | Los Angeles

+1 213-617-5549 | direct

From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Thursday, November 14, 2024 10:34 AM

To: Sarah Fan <SFan@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>

Subject: Re: Snookal, Mark v. Chevron USA, Inc. | Dr. Victor Adeyeye's Deposition

Good Morning,

Confirming that we will be starting Dr. Adeyeye's deposition tomorrow at 6:00 am pacific time. Please let me know if you have not received a Zoom link from the court reporting agency, Imagine Reporting, by today.

Best,

Olivia

From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Wednesday, November 13, 2024 4:38 PM

To: Sarah Fan <SFan@sheppardmullin.com>

Cc: Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>

Subject: Re: Snookal, Mark v. Chevron USA, Inc. | Dr. Victor Adeyeye's Deposition

Dear Counsel,

We can start Dr. Adeyeye's deposition at 6:00 am Pacific Time on 11/15 (absent an objection from our court reporting agency, from whom we are awaiting confirmation). However, we reserve the right to continue the deposition on a second day given that we never agreed to limit it to such a short time period.

Best,
Olivia

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From: Sarah Fan <SFan@sheppardmullin.com>
Sent: Wednesday, November 13, 2024 4:02 PM
To: Dolores Leal <dleal@amglaw.com>; Olivia Flechsig <oflechsig@amglaw.com>; Josie Pena <jpena@amglaw.com>; Angie Paz <apaz@amglaw.com>
Cc: Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>
Subject: Snookal, Mark v. Chevron USA, Inc. | Dr. Victor Adeyeye's Deposition

Counsel:

Dr. Victor Adeyeye's deposition is noticed for 8AM PST this Friday, November 15th. Due to end of Daylight Savings Time, 8AM PST is now equivalent to 5PM WAT in Warri, Nigeria. For security and transportation reasons, Dr. Adeyeye has a hard stop at 9AM PST / 6PM WAT. Can we start the deposition at 7AM PST or earlier to accommodate the time difference?

Thank you,
-Sarah

Sarah Fan | Associate
+1 213-617-5549 | direct
SFan@sheppardmullin.com | [Bio](#)

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_____ This message is CONFIDENTIAL and may contain legally privileged information intended only for the addressee. If you are not the addressee you may not use, forward, copy or disclose to anyone any information contained in this message. IF YOU RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY ALLRED, MAROKO & GOLDBERG IMMEDIATELY BY TELEPHONING THE SENDER NAMED ABOVE AT 323-653-6530. Thank you. _____

_____ This message is CONFIDENTIAL and may contain legally privileged information intended only for the addressee. If you are not the addressee you may not use, forward, copy or disclose to anyone any information contained in this message. IF YOU RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY ALLRED, MAROKO & GOLDBERG IMMEDIATELY BY TELEPHONING THE SENDER NAMED ABOVE AT 323-653-6530. Thank you. _____



Outlook

Re: Snookal, Mark v. Chevron U.S.A., Inc.

From Olivia Flechsig <oflechsig@amglaw.com>**Date** Tue 1/14/2025 3:59 PM**To** Sarah Fan <SFan@sheppardmullin.com>**Cc** Josie Pena <jpena@amglaw.com>; Angie Paz <apaz@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Dear Sarah,

Thank you for the call and email yesterday, and same to you all regarding the ongoing fires.

Regarding Dr. Adeyeye, thank you for the update. We do ask that you continue your efforts to obtain his availability to finish his deposition, and if we are unable to conclude his deposition during the re-opened discovery period, we reserve the right to do so afterwards.

Regarding Dr. Frangos, we are very sorry to learn about his health issues. Can you please agree to produce the doctor's note by January 28, 2025, or as soon as possible before then, so we can evaluate whether an accommodation will be possible? As of now, we have no information about the nature of his health issues or what his limitations are.

Last, we have obtained Dr. Khan's availability for his deposition, and February 17 - February 20 are all dates that would work for him and for us. Please confirm that we can move forward with one of those options.

Best,
Olivia

Olivia Flechsig, Esq.
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(323) 653-1660, Facsimile

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New York, NY 10007
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oflechsig@amglaw.com

From: Sarah Fan <SFan@sheppardmullin.com>**Sent:** Monday, January 13, 2025 2:48 PM

EXHIBIT 23/8

To: Dolores Leal <dleal@amglaw.com>; Olivia Flechsig <oflechsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>
Cc: Josie Pena <jpena@amglaw.com>; Angie Paz <apaz@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc.

Hello Dolores and Olivia:

I hope you've both been well and staying safe during the fires. I appreciate your patience. We've attached a copy of Defendant's verified supplemental responses to the second set of Special Interrogatories.

Please also see below regarding certain discovery matters, which I also discussed with Olivia earlier this afternoon. We are adding notes regarding Dr. Frangos and Dr. Sobel:

- I have not heard back from Dr. Adeyeye regarding his availability for deposition, but I have been following up and will get this to you as soon as I can.
- We do not represent Drs. Pitan and Arenyeka, who are not affiliated with Chevron U.S.A., Inc. and are retired. They were previously removed from Defendant's expert designation, but we understand that you are seeking to depose them as fact witnesses. We cannot accept service of deposition notices on their behalf.
- Regarding Dr. Frangos's deposition - Dr. Frangos's wife indicated she has serious concerns about Dr. Frangos's ability to testify because of his health condition. She is planning to provide a doctor's note to this effect, which we will provide confidentially under the protective order. Under these circumstances, please let us know if you will withdraw your request for Dr. Frangos's deposition.
- Regarding Dr. Sobel's deposition - we are working with the hospital to coordinate a date of availability for Dr. Sobel's deposition. Please let us know your dates of availability in February so we can set a mutually available date.

As always, please feel free to give me a call if you would like to discuss any of the above.

Thanks,
-Sarah

Sarah Fan | Associate
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From: Dolores Leal <dleal@amglaw.com>
Sent: Friday, January 10, 2025 5:24 PM
To: Sarah Fan <SFan@sheppardmullin.com>; Olivia Flechsig <oflechsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>
Cc: Josie Pena <jpena@amglaw.com>; Angie Paz <apaz@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc.

Hello Sarah, Robert and Tracy,

It's been a week since my email response below without a response (and more than 3 weeks since Olivia's email to you).

Can we receive a response by Monday?
Thank you.

Dolores Y. Leal
Pronouns: she/her
ALLRED, MAROKO & GOLDBERG

6300 Wilshire Blvd. Ste 1500
Los Angeles, CA 90048
323 653 6530
www.amglaw.com
dleal@amglaw.com



From: Dolores Leal

Sent: Monday, January 6, 2025 2:13 PM

To: Sarah Fan <SFan@sheppardmullin.com>; Olivia Flechsig <oflechsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Josie Pena <jpena@amglaw.com>; Angie Paz <apaz@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc.

Hi Sarah,

Olivia is on her honeymoon and out this week.

Since it's been about 3 weeks since Olivia's email to you, I see that the dates proposed by Olivia for Dr. Adeyeye came and went. Moreover, your verified responses to Plaintiff's interrogatories 20-24 have not been received. In order to avoid a motion to compel, can we expect the responses this week?

As to the remaining issues and any other which you wanted to discuss with Olivia,, in order to avoid misunderstandings, I request that you respond by email.

Thanks,

Dolores Y. Leal
Pronouns: she/her
ALLRED, MAROKO & GOLDBERG
6300 Wilshire Blvd. Ste 1500
Los Angeles, CA 90048
323 653 6530
www.amglaw.com
dleal@amglaw.com



From: Sarah Fan <SFan@sheppardmullin.com>

Sent: Monday, January 6, 2025 2:01 AM

To: Olivia Flechsig <oflechsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Josie Pena <jpena@amglaw.com>; Angie Paz <apaz@amglaw.com>; Dolores Leal <dleal@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc.

Hello Olivia:

I am writing regarding the matters in your email below. I appreciate your patience, as I have been down with the flu the past week. Our client contact has been out of the office, and we are scheduled to speak with them this week regarding the matters below. Are you available on Wednesday or Thursday to discuss the outstanding discovery matters in this case? I would like to discuss the depositions of Dr. Olorunfemi Pitan, Dr. Paul Arenyeka, and Dr. Irving Sobel as well.

Thank you,

-Sarah

Sarah Fan | Associate

SheppardMullin | Los Angeles

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From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Tuesday, December 17, 2024 9:58 AM

To: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Josie Pena <jpena@amglaw.com>; Angie Paz <apaz@amglaw.com>; Dolores Leal <dleal@amglaw.com>

Subject: Re: Snookal, Mark v. Chevron U.S.A., Inc.

Good Morning Sarah,

Please see my responses in red below.

Best,
Olivia

Olivia Flechsig, Esq.
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(323) 653-1660, Facsimile

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New York, NY 10007
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From: Sarah Fan <SFan@sheppardmullin.com>

Sent: Friday, December 13, 2024 5:00 PM

To: Olivia Flechsig <oflechsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Josie Pena <jpena@amglaw.com>; Angie Paz <apaz@amglaw.com>; Dolores Leal <dleal@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc.

Hello Olivia:

To respond to your email below:

- egarding Dr. Adeyeye's deposition, we will not be able to proceed on 12/17. I understand 12/18 and 12/20 do not work for you – please let me know if you have other dates of availability in December or the beginning of January where a 6AM Pacific start time will work for you. I can do 12/23, 12/24, 12/27, 1/2 or 1/3 at 6:00 am for Dr. Adeyeye's deposition. Please confirm a date ASAP so we can book a court reporter.
- Regarding Dr. Frangos, we are determining whether we are authorized to accept service on his behalf. We will get back to you as soon as possible. Thank you for looking into this. We will need a firm answer to this by January 4, 2024 so we can plan accordingly with the depo notice/subpoena, discovery, etc.
- Regarding the additional interrogatories, we will agree that both parties may serve an additional 10 interrogatories above the prescribed limit. Please let us know if this arrangement is agreeable. We will so stipulate, without prejudice to seek additional Interrogatories, if necessary, in the future.
- Finally, we are working on the verified responses to Plaintiff's interrogatories nos. 20-24 and hope to provide those to you shortly, though we will need to work around unavailabilities relating to the impending holidays. In light of the fact that the trial date and deadlines in this matter have been continued, please let us know if you have any pressing need for the verifications before the end of the year. It is our hope to provide them to you well before then. We will allow you to have additional time even though these were verified responses that should have been served months ago. Since even our new motion to compel deadline is fast approaching, please provide them to us by Fri. January 4, 2024 so we can avoid motions practice.

As always, please don't hesitate to reach out if you would like to discuss any of the above by phone.

Thanks,

-Sarah

Sarah Fan | Associate

SheppardMullin | Los Angeles

+1 213-617-5549 | ext. 15549

From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Thursday, December 12, 2024 3:58 PM

To: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Josie Pena <jpena@amglaw.com>; Angie Paz <apaz@amglaw.com>; Dolores Leal <dleal@amglaw.com>

Subject: Re: Snookal, Mark v. Chevron U.S.A., Inc.

Dear Sarah,

I'm writing to follow up on my email below regarding getting verified responses for the Interrogatory responses apparently produced as CUSA000830-836. It has now been over a month since you said you

EXHIBIT 23/12

would let us know as soon as possible. All we are requesting is a verified response for the information that someone clearly already prepared, and this is a *basic* requirement of FRCP Rule 33 (Rule 33(b)(3-5) reads in relevant part: "Each Interrogatory must, to the extent it is not objected to, be answered separately and fully in writing under oath . . . The person who makes the answers must sign them, and the attorney who objects must sign any objections.") Please produce CUSA000830-836 in the proper format (i.e. as verified Interrogatory responses) to us by next **Thursday, December 19th**, or we will be forced to move to compel.

Also, in light of the judge's order reopening discovery, please let us know by this **Thursday, December 16th** if you will stipulate to allow us to serve 20 additional Interrogatories so we can complete discovery, particularly concerning Dr. Frangos and other information revealed after the previous deadlines. If not, we will request relief from the court in this regard.

Also, you have not responded to my last two emails attempting to confirm Dr. Adeyeye's deposition for December 17, nor have you responded to my email about whether you will accept a deposition notice on Dr. Frangos' behalf. Please let us know in both regards **by close of business tomorrow** so that we can make plans to move forward with discovery accordingly.

Best,
Olivia

Olivia Flechsig, Esq.
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6300 Wilshire Boulevard, Suite 1500
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oflechsig@amglaw.com

From: Sarah Fan <SFan@sheppardmullin.com>
Sent: Friday, November 15, 2024 5:55 PM
To: Olivia Flechsig <oflechsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>
Cc: Josie Pena <jpena@amglaw.com>; Angie Paz <apaz@amglaw.com>; Dolores Leal <dleal@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc.

Hello Olivia:

Thank you for bringing this to our attention. We will get back to you as soon as possible regarding this.

Sarah Fan | Associate

SheppardMullin | Los Angeles

+1 213-617-5549 | direct

From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Wednesday, November 13, 2024 10:18 AM

To: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Josie Pena <jpena@amglaw.com>; Angie Paz <apaz@amglaw.com>; Dolores Leal <dleal@amglaw.com>

Subject: Re: Snookal, Mark v. Chevron U.S.A., Inc.

Counsel,

It appears the documents produced as CUSA000830-836 are documents prepared by someone to answer Plaintiff's Interrogatories Nos. 20-24 (i.e. not regular documents kept in the course and scope of Chevron's business). Please confirm, and if this is the case, produce signed verifications by the person who prepared this information in compliance with FRCP Rule 33(b)(5) ("The person who makes the answers [to the Interrogatory] must sign them, and the attorney who objects must sign any objections.) by the end of this week.

Best,
Olivia

Olivia Flechsig, Esq.
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(323) 653-1660, Facsimile

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oflechsig@amglaw.com

From: Sarah Fan <SFan@sheppardmullin.com>

Sent: Friday, November 8, 2024 5:26 PM

To: Angie Paz <apaz@amglaw.com>; Olivia Flechsig <oflechsig@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>

Cc: Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Subject: Snookal, Mark v. Chevron U.S.A., Inc.

I'm using Mimecast to share large files with you. Please see the attached instructions.

EXHIBIT 23/14

Please see the attached for service.

Sarah Fan | Associate

+1 213-617-5549 | direct

SFan@sheppardmullin.com | [Bio](#)

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RE: Mark Snookal v. Chevron USA, Inc.

From Tracey Kennedy <TKennedy@sheppardmullin.com>

Date Tue 1/28/2025 3:08 PM

To Olivia Flechsig <oflechsig@amglaw.com>

Cc Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Bee De La Cruz <BDeLaCruz@sheppardmullin.com>

Olivia

Thank you - you are correct- I forgot about your email (lost in the shuffle – my apologies)

As to Dr. Frangos we are getting that note, and working on Dr. Adeyeye's deposition

We will notice the deposition as follows

Ms. Engle 2/14 at 2 p.m.

Dr. Khan 2/19 at 10 a.m.

Tracey Kennedy

SheppardMullin | Los Angeles

+1 213-617-4249 | ext. 14249

From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Tuesday, January 28, 2025 3:04 PM

To: Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Bee De La Cruz <BDeLaCruz@sheppardmullin.com>

Subject: Re: Mark Snookal v. Chevron USA, Inc.

Dear Tracey,

Per my email on 12/31, please reach out to Dr. Sobel directly to serve the deposition notice on him and coordinate regarding his availability for his deposition.

With respect to Dr. Khan and Ms. Engel, though we do not represent them, as a professional courtesy we provided their availability to you via email back on 1/14. I notified you then that Dr. Khan and we are available on 2/17 - 2/20, and Ms. Engel and we are available after 1:00 pm on 1/31 or 2/14. Note however that at this point, I think 1/31 will be too short of notice for Ms. Engel, and their availability may since have changed. If you confirm a day and time, I will check with them again for a final time.

In addition, two weeks on, we have received no response to my 1/14 email concerning 1) when we can schedule the balance of Dr. Adeyeye's deposition and 2) when we will get the doctor's note from Dr. Frangos so we can evaluate his limitations and abilities to have his deposition taken. Please let us know about these issues ASAP.

Best,

EXHIBIT 23/17

Olivia Flechsig, Esq.

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From: Tracey Kennedy <TKennedy@sheppardmullin.com>

Sent: Tuesday, January 28, 2025 2:33 PM

To: Olivia Flechsig <oflechsig@amglaw.com>

Cc: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Bee De La Cruz <BDeLaCruz@sheppardmullin.com>

Subject: RE: Mark Snookal v. Chevron USA, Inc.

Olivia

Do you have dates for Experts Linda Engal, Dr. Irving Sobel and Dr. Khan

We are confirmed for 1/29/25 for Dr. Marmueanu and 2/10 for Dr. Baum

Tracey Kennedy

SheppardMullin | Los Angeles

+1 213-617-4249 | ext. 14249

From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Tuesday, January 21, 2025 10:27 AM

To: Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: Re: Mark Snookal v. Chevron USA, Inc.

Good Morning Tracey,

Could 2:00 pm Pacific Time work for Dr. Marmureanu's deposition on 1/29?

EXHIBIT 23/18

Best,
Olivia

Olivia Flechsig, Esq.

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From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Friday, January 17, 2025 4:39 PM

To: Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: Re: Mark Snookal v. Chevron USA, Inc.

Dear Tracey,

I will ask Dr. M and get back to you on this.

Best,
Olivia

Get [Outlook for iOS](#)

From: Tracey Kennedy <TKennedy@sheppardmullin.com>

Sent: Friday, January 17, 2025 4:31:12 PM

To: Olivia Flechsig <oflechsig@amglaw.com>

Cc: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: Mark Snookal v. Chevron USA, Inc.

Olivia,

We noticed the deposition for Dr. Marmureasu for Jan. 30 (amended) can we move to January 29 instead

Tracey Kennedy

SheppardMullin | Los Angeles

+1 213-617-4249 | ext. 14249

From: Tracey Kennedy <TKennedy@sheppardmullin.com>

Sent: Tuesday, December 31, 2024 7:27 PM

To: Olivia Flechsig <oflechsig@amglaw.com>

Cc: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Dolores Leal <dleal@amglaw.com>; Angie Paz <APaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Bee De La Cruz <BDeLaCruz@sheppardmullin.com>

Subject: Re: Mark Snookal v. Chevron USA, Inc.

Olivia

That is fine. More than happy to work on agreeable dates.

Happy New Year

Sent from my iPhone

Tracey Kennedy

On Dec 31, 2024, at 6:09 PM, Olivia Flechsig <oflechsig@amglaw.com> wrote:

Dear Counsel,

Given that these depositions were unilaterally noticed, we are not available to have Drs. Marmureanu, Baum, and Khan, nor Ms. Engel's depositions go forward on the dates that you selected. We are reaching out to them to obtain alternative dates in January and February and will let you know as soon as we have some specific availability we can offer.

For Dr. Sobel's deposition, please be in touch with him directly to serve him with a deposition subpoena. Thanks and happy New Year.

Best,
Olivia

Olivia Flechsig, Esq.

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(323) 653-1660, Facsimile

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New York, NY 10007

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oflehsig@amglaw.com

From: Bee De La Cruz <BDeLaCruz@sheppardmullin.com>
Sent: Wednesday, December 18, 2024 1:57 PM
To: Dolores Leal <dleal@amglaw.com>; Olivia Flechsig <oflehsig@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>
Cc: Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>
Subject: Mark Snookal v. Chevron USA, Inc.

Counsel,

Please see the attached documents.

Thank you.

Bee De La Cruz | Practice Specialist
+1 213-455-7656 | direct
BDeLaCruz@sheppardmullin.com

SheppardMullin

350 South Grand Avenue, 40th Floor
Los Angeles, CA 90071-3460
+1 213-620-1780 | main
www.sheppardmullin.com

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